

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER TRUST,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SANDRIDGE MISSISSIPPIAN TRUST I,
et al.,

Defendants.

Case No. 15-cv-00634-G

**DECLARATION CERTIFYING SETTling DEFENDANTS' COMPLIANCE
WITH CLASS ACTION FAIRNESS ACT NOTICE REQUIREMENTS**

I, David L. Johnson, do declare and state as follows:

1. I am an associate at the law firm of Latham & Watkins LLP (“Latham & Watkins”), counsel to Defendant Tom L. Ward in the above-captioned case. I am licensed to practice law in the District of Columbia and Virginia, and am admitted *pro hac vice* to this Court. I have personal knowledge of the facts stated in this declaration.

2. I submit this declaration to certify compliance by Defendants Tom L. Ward, Matthew K. Grubb, and James D. Bennett (the “Settling Defendants”) with the notice requirements of the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 (“CAFA”).

3. On November 16, 2021, Plaintiffs filed their Notice of Unopposed Motion for Entry of Order Preliminarily Approving Settlement and Establishing Notice

Procedures (ECF No. 461).

4. On November 19, 2021, Latham & Watkins attorneys and staff acting at my direction, on behalf of all Settling Defendants, served notice of the Plaintiffs and Settling Defendants' proposed settlement pursuant to 28 U.S.C. § 1715(b) (the "CAFA Notice") via U.S. Certified Mail upon the U.S. Attorney General and the Attorneys General of all fifty states, the District of Columbia, Puerto Rico, Guam, American Samoa, the Northern Mariana Islands, and the U.S. Virgin Islands.

5. The CAFA Notice consisted of a cover letter addressed to the appropriate federal or state official, along with (a) the Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 78), and Supplemental Allegations (ECF No. 120), filed in this action on June, 9, 2015; November 11, 2016; and May 1, 2017, respectively; (b) Plaintiffs' Memorandum of Law in Support of Unopposed Motion for Entry of Order Preliminarily Approving Settlement and Establishing Notice Procedures (ECF No. 462), filed in this action on November 16, 2021; and (c) Stipulation and Agreement of Settlement (ECF No. 463), filed in this action on November 16, 2021, which includes (i) Notice of Pendency and Proposed Partial Settlement of Class Action (Dkt. 463-1); (ii) Proof of Claim and Release Form (ECF No. 463-2); (iii) Summary Notice of Pendency and Proposed Partial Class Action Settlement (ECF No. 463-3); and (iv) [Proposed] Order and Partial Final Judgment (ECF No. 463-4).

6. Attached hereto as Exhibit A is a true and accurate copy of the cover letter to the CAFA Notice. For efficiency, the attachments to the CAFA Notice are not included in Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and ability.

Executed this 13 day of January 2022.

/s/ David L. Johnson

David L. Johnson (*admitted pro hac vice*)

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Attorney for Defendant Tom L. Ward

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2022, a true and correct copy of the foregoing
DECLARATION CERTIFYING SETTling DEFENDANTS' COMPLIANCE
WITH CLASS ACTION FAIRNESS ACT NOTICE REQUIREMENTS was filed
with the Clerk of the Court using the CM/ECF system, which sent notification of such
filing to counsel of record.

Dated: January 13, 2022

/s/ David L. Johnson

David L. Johnson